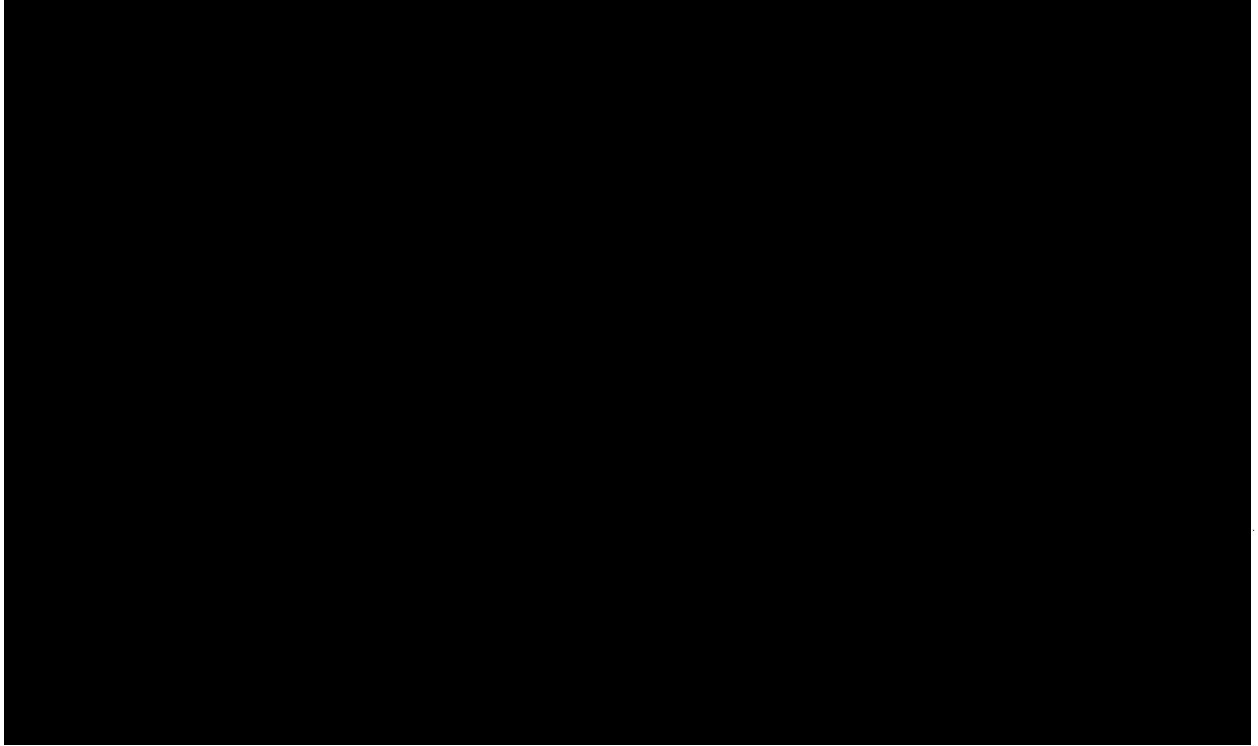


States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

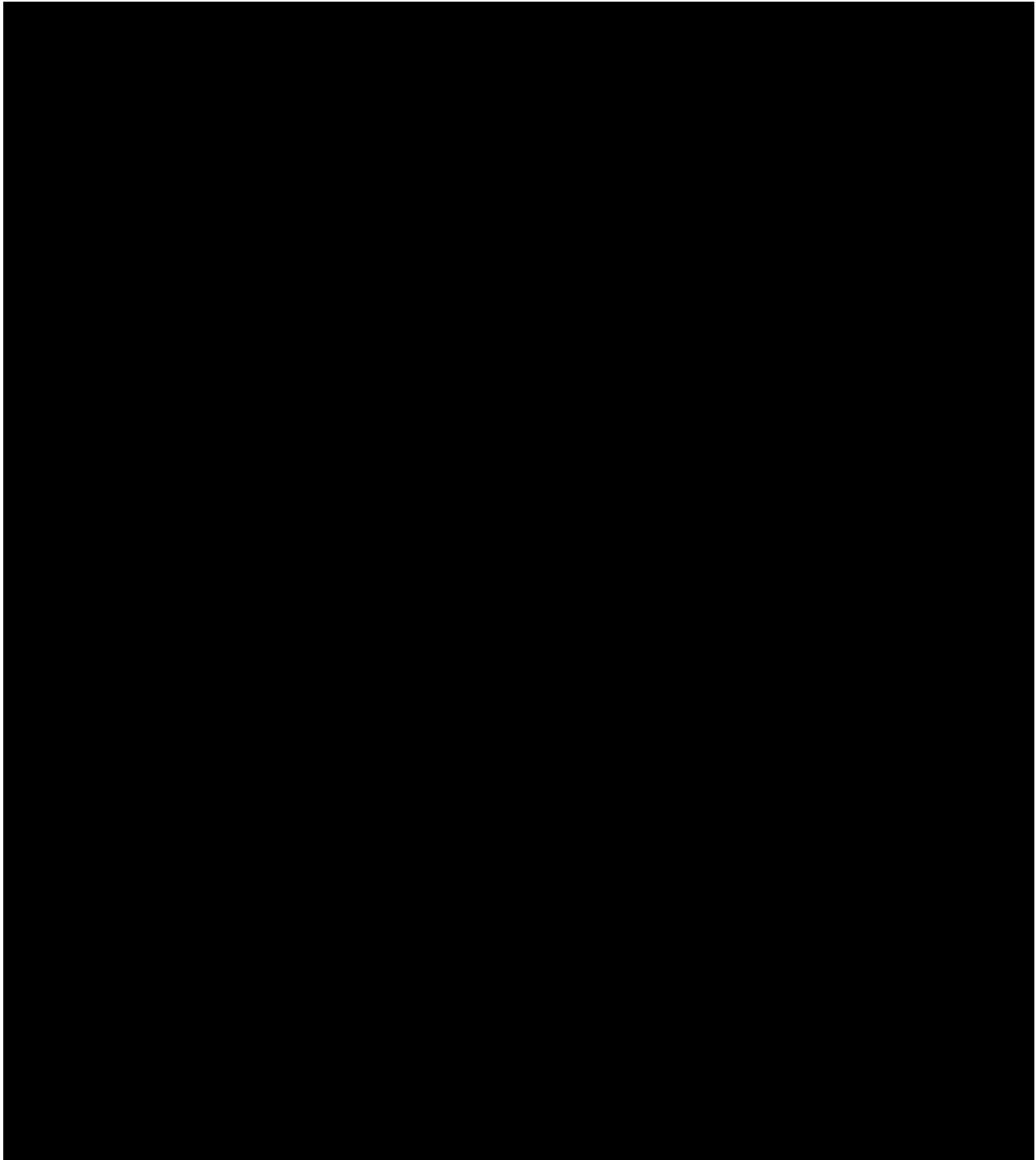
4. I am currently participating in the investigation of Rick SINGER, a resident of Newport Beach and Sacramento, California. On June 5, 2018, the Honorable Allison D. Burroughs, United States District Judge, granted the Government's application authorizing the interception of wire and electronic communications of SINGER's TARGET TELEPHONE 1 (916-384-8802). *See* 18-MC-91232-ADB. The affidavit filed in support of that above-mentioned application ("First TIII Affidavit") is incorporated herein by reference. Telephone calls and text messages intercepted between the dates of June 5, 2018 and July 2, 2018 are referred to herein as the "First Period of Interception." On July 3, 2018, Judge Burroughs granted the Government's application authorizing the continued interception of TARGET TELEPHONE 1 and the initial interception of electronic communications on SINGER's two e-mail addresses: rickwsinger@gmail.com and rwsinger@gmail.com. *See* 18-MC-91232-ADB. The affidavit filed in support of that application ("Second TIII Affidavit") is incorporated herein by reference. Telephone calls, text messages and e-mails intercepted from July 3, 2018 to August 2, 2018 are referred to herein as the "Second Period of Interception." On August 2, 2018, Judge Burroughs granted the Government's application authorizing the continued interception of TARGET TELEPHONE 1 and the continued interception of rickwsinger@gmail.com (TARGET EMAIL ACCOUNT). *See* 18-MC-91232-ADB. The affidavit filed in support of that application ("Third TIII Affidavit") is incorporated herein by reference. Telephone calls intercepted from August 2, 2018 to the present are referred to herein as the "Third Period of Interception."



c. Donna HEINEL, born in 1961, lives at [REDACTED] CA.

According to the University of South California ("USC") website, HEINEL is the Senior Associate Athletic Director at USC. Based on interceptions over TARGET TELEPHONE 1, I believe that HEINEL uses the telephone number 213-725-[REDACTED]. Based on my review of SINGER's e-mails, as well as intercepted telephone calls to and from SINGER, I believe that HEINEL assists SINGER in helping SINGER's clients gain admissions to USC. Essentially, SINGER disguises his clients as "athletes" and presents them to HEINEL. HEINEL, I believe, knows that these students are not athletes. Nonetheless, HEINEL uses these students' "athletic profiles" to secure admission for the students into USC. Up until the summer of 2018, I believe that all the money SINGER provided to HEINEL for her assistance went to USC athletic programs. However, in July 2018, HEINEL created a company called "Clear the Clearinghouse," and bank records (including records from bill.com) have shown that SINGER

has directed \$40,000 to this company in the last two months, indicating that HEINEL may now be receiving bribe payments herself.



system, and FBI will preserve and seal such communications in the manner used for other intercepted electronic communications.

CONCLUSION

117. The facts and circumstances stated herein establish probable cause that the TARGET SUBJECTS referenced above, and others yet to be identified, have engaged, are engaged, and will continue to be engaged in the specified federal offenses, that TARGET TELEPHONE 1 and the TARGET EMAIL ACCOUNT have been and will continue to be used to commit these offenses, and that the interception of wire and electronic communications over TARGET TELEPHONE 1 and the TARGET EMAIL ACCOUNT will result in and is necessary for the acquisition of sufficient relevant evidence of the commission of the TARGET OFFENSES. In addition, there is probable cause to conclude that relevant communications will be intercepted on a continuing basis following the first interception of the wire communications and the electronic communications that are the object of the application.

118. Therefore, I request that interceptions not automatically terminate when the wire and electronic communications described herein are first intercepted, but may continue until the full scope of the organization is developed, including the identification of all participants, the identification of their places and methods of operation, and the identification of the various activities in which they are engaged in furtherance of the organization, not to exceed a period of thirty (30) days. It is requested that the FBI be provided all information regarding corresponding switch and cell site numbers and locations for all geographical locations within the United States where TARGET TELEPHONE 1 is in use.

119. It is requested that this affidavit be sealed until further order of the Court in order to avoid premature disclosure of the investigation, guard against the flight of the TARGET

SUBJECTS, and better ensure the safety of agents and others, except that copies may be provided to investigating agents.

I, Laura Smith, having signed this Affidavit under oath as to all assertions and allegations contained herein, state that its contents are true and correct to the best of my knowledge, information, and belief.



Laura Smith
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me
this 30th day of August, 2018 at 2:05 a.m./p.m.



HON. ALLISON D. BURROUGHS
UNITED STATES DISTRICT JUDGE